From:
 Werner, Robert

 To:
 Salinas, Amy

 Cc:
 Johnson, Lydia

Subject: CES Environmental Services, Inc.- Houston (A6JP) - Suggested event timeline for 08/14/14 presentation to

Pam/Carl & Susan Webster

Date: Wednesday, August 13, 2014 7:07:56 AM

Amy,

Comments on the following suggested event timeline beginning Monday 08/18/14:

First, second, and third weeks (08/18/14 thru 09/05/14)

Review CDs obtained from EPA's CID and:

- Prepare list of names, contact information, and documents for CES customers that scanned records indicate or confirm their responsibility for shipment(s) of hazardous substances to the CES Houston facility.
- Prepare list of names and contact information for CES employees for possible future interviews.
- Prepare and make ready General Notice letter (GNL) and combination 104(e) Information Request/General Notice letter (COMBOL) for future merging of applicable PRP addresses.
- Prepare and make ready AOC for future PRPs agreeable to participate in the removal action.

Fourth week (09/08/14 thru 09/12/14)

- Review names and gathered information about CES customers.
- Select names of identified major CES customers/PRPs that warrant receipt of General Notice letters.
- If warranted, select names of remaining major CES customers that warrant receipt of combination 104(e) Information Request/General Notice letters.
- If warranted, select names of remaining major CES customers that warrant receipt of only 104(e) Information Request letters.
- Merge selected names into GNLs and/or COMBOLs.

Fifth and sixth weeks (09/15/14 thru 09/26/14)

• Circulate GNLs and/or COMBOLs for needed concurrences.

Seventh week (09/29/14 thru 10/03/14)

- Issue all GNLs (allow 15 day response time).
- Issue all COMBOLs (allow 15 day response time for the GNL part and 30 day response time with probability of 60 day response time for the 104(e) Information Request).
- If warranted, issue only 104(e) Information Request letters to select major CES customers (allow 30 day response time with probability of 60 day response time).

Eight and ninth weeks (10/06/14 thru 10/17/14)

- Review responses from all issued General Notice letters.
- Negotiate with PRPs.

Tenth week (10/20/14 thru 10/24/14)

• Obtain signatures for AOCs with PRPs agreeable to participate in the removal action.

12/01/14 thru 12/05/14

• Evaluate 104(e) Information Request letter responses and take appropriate action.